

# **Exhibit 4**

**From:** Mickey McCoy  
**Sent:** Wednesday, September 4, 2019 2:03 PM  
**To:** drannie@pennmedicine.upenn.edu  
**Cc:** Brent Ceryes <bceryes@sfspa.com>  
**Subject:** ECFMG - Akoda Matter

Good day Dr. Steinberg:

Attached to this email are the following documents for your review, I will also be sending Fed-Ex to the address you provided:

1. ECFMG Complaint
2. Dep Transcript of Desire Evans
3. Dep Transcript of Elsa Powell
4. Dep Transcript of William Kelly

Thank you for your assistance and should you have any questions, please do not hesitate to contact our office.

---

Citrix Attachments

Expires March 2, 2020

Dep Transcript of Desire Evans.pdf	4.5 MB
Dep Transcript of Elsa Powell.pdf	4.7 MB
Dep Transcript of William Kelly.pdf	7.4 MB
<hr/>	
ECFMG Complaint.PDF	1.6 MB

[Download Attachments](#)

Mickey McCoy uses Citrix Files to share documents securely.

Mickey Y. McCoy, Mass Tort Paralegal  
SCHOCHOR, FEDERICO AND STATON, P.A.  
1211 Saint Paul Street  
Baltimore, MD 21202  
mmccoy@sfspa.com  
410-234-1000 – Office  
410-234-2846 – Facsimile

***The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, please be advised that any dissemination, distribution or copying is strictly prohibited. If you have received this e-mail in error, please immediately e-mail the sender.***



Emails0001

**From:** Brent Cerves  
**To:** Steinberg, Annie; jon.schochor@gmail.com; Phil Federico  
**Cc:** Lisa Bain; stephen.ehrlich@themcsgroup.com  
**Subject:** Re: Akoda questionnaire for your review  
**Date:** Sunday, September 08, 2019 7:27:53 AM

---

Dr. Steinberg,

I have reviewed the questionnaire, and have the following comments.

1b. While this list should cover most of our clients, we may want to include an option for "Other."

5a. None of these women would have recieved an unsolicited call from an attorney. I would suggest removing that option.

I will discuss with Jon and Phil and let you know their thoughts.

If you would like to discuss these changes, please feel free to call today on my cell phone at (410) 598 1667.

Thank you.  
Brent

**Brent Ceryes**

---

**From:** Brent Ceryes  
**Sent:** Wednesday, September 11, 2019 11:20 AM  
**To:** 'Steinberg, Annie'  
**Subject:** FW: Urgent: Akoda Matter

Dr. Steinberg:

The emails have been sent for our clients. The text is below.

Thanks.

Dear Ms. Day,

As you know, we have filed a lawsuit against the Educational Commission for Foreign Medical Graduates ("ECFMG"). We allege that ECFMG, which checks the credentials of foreign medical graduates, knew or should have known of wrongful conduct by "Charles Akoda," but failed to take action to stop him from practicing medicine. As a result, "Akoda" was allowed to see and treat patients with an unlawfully obtained medical license. You are a potential Class Member in this lawsuit.

In order to understand the experiences of our clients, we have hired an expert in forensic psychiatry, Dr. Annie Steinberg. To allow Dr. Steinberg to help us go forward with this lawsuit and collect the information necessary for her opinions, you will need to complete a questionnaire to share your experiences and feelings as a patient of Akoda.

This questionnaire must be completed by clicking the following link:

<https://fs4.formsite.com/Nx0yfi/lbpxinxt4/index.html>

You will be asked to login using your email address. In the Password field, please enter "AKSurvey@2019" without quotes. This email address will only be used to identify your submission.

**It is very important that you complete this questionnaire so that we can proceed with your case.**

**Please respond to this questionnaire no later than this Friday, September 13, 2019.**

We estimate that this questionnaire should take approximately 10 minutes to complete.

If you have any questions about this process, or if you need help with the questionnaire, please contact us at 410 234 1000.

Sincerely,

Brent Ceryes

Attorney

Schochor, Federico & Staton, P.A.

1211 St. Paul Street

Baltimore, Maryland 21202

(410) 234 - 1000



## Brent Ceryes

---

**From:** Brent Ceryes  
**Sent:** Wednesday, September 11, 2019 3:02 PM  
**To:** Steinberg, Annie  
**Subject:** FW: Desire Evans - 09.05.19 - Monique Russell, et al. v. Educational Commission for Foreign Medical Graduates - FINAL  
**Attachments:** de090519.pdf; de090519.ptx; de090519.txt; Evans Exhibits 09.05.19.zip

**From:** Production <Production@golkow.com>  
**Sent:** Wednesday, September 11, 2019 9:08 AM  
**To:** Brent Ceryes <bceryes@sfspa.com>  
**Cc:** Finals <Finals@golkow.com>  
**Subject:** Desire Evans - 09.05.19 - Monique Russell, et al. v. Educational Commission for Foreign Medical Graduates - FINAL

Please find attached the FINAL Ascii and e-transcript of Desire Evans.

This attachment is in e-transcript PTX format, which requires a downloadable viewer in order to open it. You can obtain the PTX viewer free of charge at the following link: <http://store.westlaw.com/software/ebundle/viewer/default.aspx>. You need only download the viewer once. If you've previously installed the viewer, simply double-click the attached PTX file. For your convenience, a plain text ASCII is also attached for importation into LiveNote, Summation and/or most word-processing programs.

If we can be of any further assistance in this matter, please do not hesitate to contact us.

Thank you,  
**Chrissy Tafel**  
*Case Manager*  
One Liberty Place  
1650 Market Street, Suite 5150  
Philadelphia, Pennsylvania 19103  
[www.Golkow.com](http://www.Golkow.com) | 215.586.4223 | 877.370.DEPS | [CTafel@golkow.com](mailto:CTafel@golkow.com)



Discovery Depositions Trial

**Legal Disclaimer:** The information contained in this message may be privileged and confidential and protected from disclosures by federal privacy laws. Any medically related patient information contained herein is protected under federal privacy laws, including but not limited to the Health Insurance Portability and Accountability Act of 1996 (HIPAA). This information is not to be relayed to unauthorized third parties. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to the message and delete this email from your system.

## Brent Ceryes

---

**From:** Brent Ceryes  
**Sent:** Wednesday, September 11, 2019 3:02 PM  
**To:** Steinberg, Annie  
**Subject:** FW: Elsa Powell - 09.06.19 - Monique Russell, et al. v. Educational Commission for Foreign Medical Graduates - FINAL  
**Attachments:** Powell Exhibits 09.06.19.zip; ep090619.pdf; ep090619.ptx; ep090619.txt

**From:** Production <Production@golkow.com>  
**Sent:** Wednesday, September 11, 2019 9:21 AM  
**To:** Brent Ceryes <bceryes@sfspa.com>  
**Cc:** Finals <Finals@golkow.com>  
**Subject:** Elsa Powell - 09.06.19 - Monique Russell, et al. v. Educational Commission for Foreign Medical Graduates - FINAL

Please find attached the FINAL Ascii and e-transcript of Elsa Powell.

This attachment is in e-transcript PTX format, which requires a downloadable viewer in order to open it. You can obtain the PTX viewer free of charge at the following link: <http://store.westlaw.com/software/ebundle/viewer/default.aspx>. You need only download the viewer once. If you've previously installed the viewer, simply double-click the attached PTX file. For your convenience, a plain text ASCII is also attached for importation into LiveNote, Summation and/or most word-processing programs.

If we can be of any further assistance in this matter, please do not hesitate to contact us.

Thank you,

**Chrissy Tafel**

**Case Manager**

One Liberty Place

1650 Market Street, Suite 5150

Philadelphia, Pennsylvania 19103

[www.Golkow.com](http://www.Golkow.com) | 215.586.4223 | 877.370.DEPS | [CTafel@golkow.com](mailto:CTafel@golkow.com)



Discovery Depositions Trial

**Legal Disclaimer:** The information contained in this message may be privileged and confidential and protected from disclosures by federal privacy laws. Any medically related patient information contained herein is protected under federal privacy laws, including but not limited to the Health Insurance Portability and Accountability Act of 1996 (HIPAA). This information is not to be relayed to unauthorized third parties. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify the sender immediately by replying to the message and delete this email from your system.



**Brent Ceryes**

---

**From:** Brent Ceryes  
**Sent:** Thursday, September 19, 2019 5:25 PM  
**To:** Steinberg, Annie  
**Subject:** ECFMG; Expert Report

Dear Dr. Steinberg,

As we have discussed, and as you have seen in our Complaint, this case involves an individual known to our clients as "Dr. Charles Akoda," who undertook to act as a gynecologist/obstetrician to potentially over 1,000 patients.

"Akoda" a/k/a "Oluwafemi Igeberase," has admitted to using various fictitious identities, including the "Akoda" identity, as well as a variety of fake identification, including a fake passport, a fraudulent social security number, fraudulent or altered medical transcripts, fraudulent or altered diplomas, and fraudulent letters of recommendation, in order to obtain ECFMG certification, obtain admission to residency programs and ultimately act as an obstetrician/gynecologist, performing medical procedures and gynecologic examinations on patients. Through this conduct, this individual intentionally sought to circumvent the lawful process designed to ensure the competency and character of foreign medical graduates, placing patients at risk.

This lawsuit has been filed against the Educational Commission for Foreign Medical Graduates, which was made aware in 2000 that "Akoda" had used a fraudulent social security number in documentation submitted to ECFMG and the Jersey Shore residency program. ECFMG was also made aware at that time that "Akoda" had admitted to previously using other aliases, including the "Igeberase" identity. Notably, ECFMG had previously revoked the ECFMG certification of "Igeberase" as a result of false statements he made on ECFMG applications.

We allege, among other allegations, that ECFMG was negligent in failing to investigate and take appropriate action to revoke the ECFMG certification issued to "Akoda" after having been made aware of these and other concerns. We allege that as a result of this negligence, our clients have suffered significant emotional distress, including the distress and fear they experienced upon learning that the individual they trusted to render medical care was not a lawfully-licensed physician, and had engaged in substantial fraud in order to become their obstetrician/gynecologist. Additionally, clients have identified concerns regarding potential inappropriate behavior and conduct.

Consistent with our prior discussions, we have asked you to oversee a survey of the potential damages our clients may have experienced concerning this incident. We have distributed the survey you designed to our clients, and ask that you review the results of those surveys and provide us your analysis of the results in a report.

As this matter is pending in federal court, please include the following with your report, consistent with Federal Rule 26:

- (i) a complete statement of all opinions the witness will express and the basis and reasons for them;
- (ii) the facts or data considered by the witness in forming them;
- (iii) any exhibits that will be used to summarize or support them;
- (iv) the witness's qualifications, including a list of all publications authored in the previous 10 years;
- (v) a list of all other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition; and



(vi) a statement of the compensation to be paid for the study and testimony in the case.

We look forward to the receipt of your report.

Thank you.

Brent Ceryes  
Attorney  
Schochor, Federico & Staton, P.A.  
The Paulton  
1211 St. Paul Street  
Baltimore, MD 21202  
(410) 234 -1000

The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, please be advised that any dissemination, distribution or copying is strictly prohibited. If you think that you have received this e-mail in error, please immediately e-mail the sender at [bceryes@sfspa.com](mailto:bceryes@sfspa.com). Thank you.

**Brent Ceryes**

---

**From:** Brent Ceryes  
**Sent:** Saturday, September 21, 2019 5:31 PM  
**To:** Steinberg, Annie  
**Subject:** Re: quick question

Filed on December 10, 2018 in court of common pleas of Philadelphia County, but it was thereafter removed to Federal District Court for the Eastern District of PA.

In response to Lisa's other questions, my understanding is that the questionnaire was emailed to all individuals on Stephen's list. I do not believe that any questionnaires were completed over the phone.

Get [Outlook for Android](#)

**From:** [Brent Ceryes](#)  
**To:** [Steinberg, Annie](#)  
**Cc:** [stephen.ehrlich@themcsgroup.com](#); [Lisa Bain](#)  
**Subject:** Re: need to know how many questionnaires were sent out.  
**Date:** Sunday, September 22, 2019 7:27:20 AM

---

It looks like 575 emails, per Stephen's list. Stephen creates two accounts for me (first had a typo), but I only accessed the form. I did not answer any of the questions. If 305 is completed forms, I am not in that number.

Get [Outlook for Android](#)

---

**From:** Steinberg, Annie <[drannie@pennmedicine.upenn.edu](mailto:drannie@pennmedicine.upenn.edu)>  
**Sent:** Sunday, September 22, 2019 12:40:47 AM  
**To:** Brent Ceryes <[bceryes@sfspa.com](mailto:bceryes@sfspa.com)>  
**Cc:** [stephen.ehrlich@themcsgroup.com](#) <[stephen.ehrlich@themcsgroup.com](mailto:stephen.ehrlich@themcsgroup.com)>; [Lisa Bain](#) <[lisa.bain@gmail.com](mailto:lisa.bain@gmail.com)>  
**Subject:** need to know how many questionnaires were sent out.

Redacted - Trial Preparation Material